IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION

The United States of America for the use and benefit of Robert Lloyd Electric Co., Inc., Plaintiff,

vs.

Fluor Enterprises, Inc., et al.,

Defendants.

Civil Action No.: 6:19-cv2419-BHH

JOINT MOTION FOR ENTRY OF AMENDED SCHEDULING ORDER

Under Federal Rule of Civil Procedure (16(b)(4) and Local Rule 6.01, the Parties, Robert Lloyd Electric Co. Inc., ("RLE"), Fluor Enterprises, Inc. ("Fluor Enterprises"), Fluor Daniel Caribbean, Inc. ("Fluor Daniel"), Zurich American Insurance Co. ("Zurich"), Fidelity and Deposit Company of Maryland ("F&D"), Federal Insurance Co. ("Federal"), Liberty Mutual Insurance Co. ("Liberty"), and Travelers Casualty and Surety Co. ("Travelers") (collectively, the "Sureties"), jointly move this Court to issue an Amended Scheduling Order extending certain unexpired deadlines set forth in the Consent Amended Scheduling Order (Entry No. 75) by Fourteen (14) days except where a deadline falls on a weekend or holiday and then to the following business day.

The Parties have been diligently taking depositions since July, but have agreed that all need an additional two weeks to complete approximately eight (8) remaining depositions. The parties also want to establish an earlier mediation deadline.

The deadlines set forth in the proposed Consent Amended Scheduling Order are based on extending the dates in the Consent Amended Scheduling Order dated June 16, 2020. Plaintiff and

Defendants jointly request that this Court grant the Parties' Joint Motion for Entry of an Amended Scheduling Order as shown in the attached proposed Consent Amended Scheduling Order.

PLAINTIFF

s/R. Bryan Barnes

R. Bryan Barnes (USDC Bar No. 1196) Catherine Ava Kopiec (USDC Bar No. 11513) **ROGERS TOWNSEND, LLC** 1221 Main Street, 14th Floor (29201)

Post Office Box 100200 Columbia, SC 29202

Main: (803) 771-7900; Fax: (803) 343-7013 Email: Bryan.Barnes@rogerstownsend.com Catherine.Kopiec@rogerstownsendlaw.com Attorneys for Robert Lloyd Electric Co., Inc

DEFENDANT(S)

s/ Samuel W. Outten

Samuel W. Outten (USDC Bar No. 2943) Katie E. Towery (USDC Bar No. 12861) NELSON MULLINS RILEY & SCARBOROUGH, LLP 104 South Main Street, Ninth Floor Post Office Box 10084 (29603-0084) Greenville, South Carolina 29601

Scott P. Fitzsimmons (pro hac vice) Kathleen Olden Barnes (pro hac vice) Watt, Tieder, Hoffar & Fitzgerald, LLP 1765 Greensboro Station Place, Suite 1000 McLean, Virginia 22102

Columbia, South Carolina September 2, 2020